

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS**

Bear Communications, Inc.,

Plaintiff,

v.

Vitas Raciunas,

Defendant.

Case No. 1:24-cv-09060

Hon. Jeffrey I. Cummings

JOINT STATUS REPORT

Plaintiff Bear Communications, Inc. (“BearCom”) and Defendant Vitas Raciunas (“Defendant”) (collectively “Parties”), by their attorneys, submit the following Joint Status Report:

1. On October 18, 2024, the Court entered an Order for Preliminary Injunction against Defendant. ECF 14.
2. On November 12, 2024, the Court entered an Order requiring the Parties to file a joint status report regarding settlement by November 27, 2024. ECF 15.
3. On November 21, 2024, following review of the forensic analysis agreed to in the Preliminary Injunction, BearCom filed a Motion to Compel Defendant to produce certain text messages that Defendant directed not be released to BearCom by the forensic analysis firm. ECF 16.
4. Defendant opposes the relief sought in the Motion to Compel; his response is due by December 5, 2024 (per the Parties’ agreed suggested briefing schedule found in the Motion to Compel). ECF 16.
5. In light of this dispute, settlement negotiations have not advanced.

Date: November 27, 2024

/s/ Timothy J. Klein (w/permission)

Timothy J. Klein, Esq.
290 Springfield, Drive
Suite 155
Bloomington, IL 60108
(630) 893-5200
kleinlaw@aol.com

*Counsel for Defendant
Vitas Raciunas*

Respectfully submitted,

/s/ Adam J. Weiner

Alec W. Farr (*pro hac vice*)
PERKINS COIE LLP
700 Thirteenth Street, N.W.
Suite 800
Washington, DC 20005
(202) 434-1603
afarr@perkinscoie.com

Adam J. Weiner
PERKINS COIE LLP
110 North Wacker Drive
Suite 3400
Chicago, IL 60606
(312) 324-8400
aweiner@perkinscoie.com
*Counsel for Plaintiff
Bear Communications, Inc.*

CERTIFICATE OF SERVICE

I, Adam J. Weiner, certify that on November 27, 2024, a true and correct copy of the foregoing document was caused to be served on all parties via the Court's CM/ECF system which will send a notification of such filing to all parties and attorneys of record.

/s/ Adam J. Weiner